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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

NILDA GUTIERREZ, et al.,

Plaintiffs,

v.

JOHNSON & JOHNSON,

Defendant.

Civil Action No. 01-5302 (WHW)

**DECLARATION OF
MARIA H. KEANE**

**(RE-FILED TO UNSEAL
TESTIMONY AND EXHIBITS
PREVIOUSLY FILED ON JULY 16-
17, 2006)**

Pursuant to 28 U.S.C. § 1746, Maria H. Keane declares under penalty of perjury the following to be true and correct:

1. I am over the age of eighteen and am an attorney licensed to practice in the State of New York. I am Counsel at Paul, Weiss, Rifkind, Wharton & Garrison LLP, which represents Defendant Johnson & Johnson in this matter, and have been admitted pro hac vice to the District of New Jersey for this matter. I make this declaration to supplement the record a) in opposition to plaintiffs' motion for class certification, plaintiffs' motion to strike the expert report of Dr. David Wise, plaintiffs' motion for sanctions, and plaintiffs' motion for appointment of class counsel, and b) in support of Johnson & Johnson's motion to strike the expert report and testimony of Drs. Madden and Vekker.

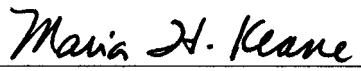
2. Attached hereto are true and correct copies of the following documents produced in discovery and deposition testimony, with exhibits.

Exhibit Number	Description
1	Performance appraisals from the statistical sample of Dr. Eugene Ericksen (not attached) (remaining under seal as filed on July 16-17, 2006, docket entries 152 et seq.).
2	Performance appraisals for the named plaintiffs dated 1997 and on (not attached) (remaining under seal as filed on July 16-17, 2006, docket entries 152 et seq.).
3	Performance appraisals for plaintiffs' declarants dated 1997 and on (not attached) (remaining under seal as filed on July 16-17, 2006, docket entries 152 et seq.).
4	Deposition transcript and exhibits for Michael Carey (March 1, 2006) (redacted) (unredacted version filed under seal July 16-17, 2006, docket entries 152 et seq.).

- 5 Deposition transcripts and exhibits of Human Resources declarants (redacted) (unredacted version filed under seal July 16-17, 2006, docket entries 152 et seq.).
- 6 Deposition transcripts and exhibits of plaintiffs' and defendants' experts (redacted) (unredacted version filed under seal July 16-17, 2006, docket entries 152 et seq.).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 4th day of October, 2006.



Maria H. Keane